

From: [Aaron Lukken](#)
To: [Rachel Penski Fissell](#)
Subject: Re: Service on a Venezuelan-state owned entity
Date: Thursday, February 17, 2022 3:17:18 PM
Attachments: Outlook-h5wliql0.png

As we discussed, absent a special arrangement between the parties, 28 U.S.C. 1608(b) (the Foreign Sovereign Immunities Act section on serving state instrumentalities) offers only **two** avenues to service in this instance without a direct action in a Venezuelan court *after* these two methods have been exhausted. Confirming previously discussed costs here...

HAGUE SERVICE (rendered mandatory by *Volkswagen v. Schlunk*, 486 U.S. 694 (1988)):

- Our fee to prepare, compile, and manage the Hague Request: **\$1,500**
- Translation of service documents, estimate \$70/page on average (though competent translators charge by the word-- not by the page-- this presumes roughly 80 pages): **\$5,600**
- Printing & shipping: **\$400** (all documents, including translations, must be sent to Caracas in duplicate-- this presumes roughly 80 pages of originals)
- TOTAL: **\$7,500**

LETTER ROGATORY (assuming Hague attempt fails-- which is distinctly possible):

- Our fee to draft the Letter Rogatory itself and application for its issuance by the court, as well as translation of the executed Letter: **\$2,000**
- Fees paid to State Department: **\$2,275**
- Translation: will already have been completed for Hague service.
- Printing & shipping: **\$250** (all documents, including translations, must be sent to the State Department in duplicate-- this likewise presumes roughly 80 pages of originals)
- TOTAL: **\$4,525**

For each method, we cannot reasonably expect to receive a response for several months, if not more than a year.

By all means, let me know what questions remain or arise later.

Many thanks,
Aaron

Aaron Lukken

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From: Rachel Penski Fissell <rfissell@walfishfissell.com>

Sent: Thursday, February 17, 2022 13:28

To: Aaron Lukken <lukken@vikinglaw.us>

Subject: Service on a Venezuelan-state owned entity

Aaron:

Per our earlier discussions, could you please provide me with pricing for service of a complaint and three attachments (totaling approximately 78 pages) on a Venezuelan-state owned entity via the Hague Convention and, if as you expect Hague Convention service fails, the pricing for service via letters rogatory?

Thanks,
Rachel

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